



Fwd: RE: Lewis vs. ASR -- proposed redactions

Nathaniel K. Charny

to:

Steve\_Taronji@cit.uscourts.gov

04/21/2018 10:05 PM

Cc:

"Michael T. Hensley", Lauren Fenton-Valdivia, Megan Goddard

Hide Details

From: "Nathaniel K. Charny" <ncharny@charnywheeler.com>

To: "Steve\_Taronji@cit.uscourts.gov" <Steve\_Taronji@cit.uscourts.gov>

Cc: "Michael T. Hensley" <MHensley@bressler.com>, Lauren Fenton-Valdivia <LFValdivia@bressler.com>, Megan Goddard <megan@goddardlawnc.com>

History: This message has been replied to and forwarded.

Mr. Taronji: Below is the email thread between counsel regarding the proposed redactions. Plaintiff's proposal is the first message. Defendants' response is a ove that. Thank you.

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**From:** Michael T. Hensley <MHensley@bressler.com>  
**Sent:** Saturday, April 21, 2018 6:20:50 PM  
**To:** Nathaniel K. Charny; Lauren Fenton-Valdivia  
**Cc:** megan@goddardlawnc.com  
**Subject:** RE: Lewis vs. ASR -- proposed redactions

Nat,

I object to your proposal to strike. I think it is clear from the transcript that you elicited that Mr. Ramphal did not have personal knowledge as to whether Mr. Lewis actually received his holiday pay. You did not elicit that he has no personal knowledge regarding the events leading up to Mr. Lewis' failure to show up to work, and his testimony on cross is that he did have such personal knowledge.

Very truly yours,

**Michael T. Hensley**  
 Principal  
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**BRESSLERAMERYROSS**

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**From:** Nathaniel K. Charny [<mailto:ncharny@charnywheeler.com>]

**Sent:** Saturday, April 21, 2018 4:33 PM

**To:** Michael T. Hensley <MHensley@bressler.com>; Lauren Fenton-Valdivia <LFValdivia@bressler.com>

**Cc:** megan@goddardlawny.com

**Subject:** Lewis vs. ASR -- proposed redactions

Mike:

Per the Judge's request, here is my proposal on striking Ramphal's testimony regarding the holiday pay issue.

Page 869, Line 4 through Page 870, Line 2; and Page 870, Line 7 through Page 870, Line 9.

Please let me know whether you agree and if not, your response.

Thanks,

Nat Charny

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